

# SEEGERWEISS LLP

August 13, 2018

**Via ECF**

Honorable Anita B. Brody  
United States District Judge  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

Re: *In re National Football League Players' Concussion Injury Litigation*,  
No. 12-md-2323-AB  
Cambridge Entities' Letters, dated August 10, 2018

Dear Judge Brody:

Co-Lead Class Counsel respectfully submits this Status Report to provide the Court with a further update on the issue of the Cambridge Entities' failure to produce "accounting" documents for certain Class Members' retirement monies, as directed by the Court's Order, dated February 20, 2018 [ECF No. 9750]. Late on Friday, August 10, 2018, we received the attached two letters from counsel for Cambridge. The first is a letter and attachment from Gail Milon, Managing Vice President of Cambridge Capital Group, which is attached hereto as Exhibit A. The second is a letter from Cambridge's retained auditor, Bill Bogan, CPA, CGFO, CPFO, which is attached as Exhibit B.

In summary, in addition to the fact that what had been produced by Cambridge on August 1, 2018 was insufficient, as discussed in my previous Status Report to the Court, dated August 1, 2018 [ECF No. 10186], Cambridge now advises in these two letters that those reports were both inaccurate and incomplete and "should not be relied upon." Simply put, Cambridge continues to obfuscate and delay.

We thank the Court for its consideration of this submission and look forward to tomorrow's conference concerning this matter.

Respectfully,

/s/ Christopher A. Seeger  
Christopher A. Seeger  
Co-Lead Class Counsel

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing Status Report and attachments, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: August 13, 2018

/s/ Christopher A. Seeger  
Christopher A. Seeger